

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

**MINISTRY OF OIL OF THE
REPUBLIC OF IRAQ,**

Plaintiff,

vs.

**1,032,212 BARRELS OF CRUDE OIL,
THE KURDISTAN REGION OF IRAQ,
AND JOHN DOE BUYER,**

Defendants.

C.A. NO. 3:14-cv-249

**UNOPPOSED MOTION TO EXCEED PAGE LIMITS
OF DEFENDANT THE KURDISTAN REGION OF IRAQ**

Defendant The Kurdistan Region of Iraq (“KRG”) respectfully seeks leave to exceed the page limitation set forth in Section 7(A) of this Court’s Procedures by the filing of its Reply to the Response of Plaintiff the Ministry of Oil of the Republic of Iraq (“MoO”) to the KRG’s Motion For Certification Under 28 U.S.C. § 1292(b) and For A Stay Pending Appeal. In support thereof, the KRG respectfully avers that Plaintiff’s Memorandum of Law in Response to the KRG’s Motion For Certification Under 28 U.S.C. § 1292(b) and For A Stay Pending Appeal (Dkt. No. 66) raises issues that cannot be adequately addressed within the Court’s 5 page limitation, including the proper standard for certification under § 1292(b), the appropriateness of a stay pending interlocutory appeal, and the grounds for difference of opinion as to the political question doctrine, the act of state doctrine, and issues of Iraqi constitutional and statutory law.

Undersigned counsel has conferred with counsel for the MoO and represents that this Motion for Leave is not opposed.

WHEREFORE the KRG respectfully urges this Honorable Court to grant it leave to exceed the page limitation by filing the attached Reply to the Response of Plaintiff the Ministry

of Oil of the Republic of Iraq to the KRG's Motion For Certification Under 28 U.S.C. § 1292(b) and For A Stay Pending Appeal.

Respectfully submitted,

/s/ Harold K. Watson

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CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with Plaintiff's counsel and that they are unopposed to the relief sought in this Motion.

/s/ Harold K. Watson
Harold K. Watson

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February, 2015, I served a true and correct copy of the foregoing Unopposed Motion to Exceed Page Limits pursuant to Rule 5 of the Federal Rules of Civil Procedure, via the CM/ECF Filing System and/or by depositing the same in the United States Mail, postage prepaid and properly addressed to all known counsel of record:

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